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# LEGALFORCE RAJ ABHYANKER, P.C.

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Attorneys for Defendant and  
Petitioner

Raj Abhyanker

Attorneys for Defendant and Counterclaimant

Raj Abhyanker

UNITED STATES

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

NEXTDOOR.COM, INC., a Delaware corporation,

Case No. 3:12-cv-05667-EMC

Plaintiff,

**STIPULATION AND [PROPOSED]  
ORDER FOR VOLUNTARY DISMISSAL  
WITH PREJUDICE OF DEFENDANT AND  
COUNTERCLAIMANT RAJ  
ABHYANKER'S COUNTERCLAIMS  
AGAINST COUNTERDEFENDANTS  
NEXTDOOR.COM, INC. AND PRAKASH  
JANAKIRAMAN**

RAJ ABHYANKER, an individual,

Defendant.

Case Filed: November 5, 2012

Judge: Honorable Edward M. Chen

NEXTDOOR.COM, INC., a Delaware corporation; and PRAKASH JANAKIRAMAN, an individual;

## Counterdefendants

1 Plaintiffs/Counterdefendants Nextdoor.com, Inc. (“Nextdoor.com”) and Prakash  
2 Janakiraman (“Janakiraman”) and Defendant/Counterclaimant Raj Abhyanker (“Abhyanker”),  
3 through their counsel of record, hereby stipulate and agree, and request the Court to enter, the  
4 following Order resolving Abhyanker’s counterclaims in this matter.

5 1. On December 5, 2013, Abhyanker filed a Second Amended Answer and  
6 Counterclaims [Dkt. No. 132] (“SACC”), asserting counterclaims for trade secret  
7 misappropriation against Nextdoor.com and Janakiraman, and trademark infringement,  
8 infringement of an unregistered mark, and California unfair competition against Nextdoor.com.

9 2. On May 8, 2014, Nextdoor.com and Abhyanker stipulated to a dismissal of  
10 Abhyanker’s trademark infringement counterclaim, and to entry of judgment on Nextdoor.com’s  
11 claim for declaratory judgment that it has established trademark rights, including priority of use,  
12 of the NEXTDOOR Mark in the field of online social networking [Dkt. 188].

13 3. Abhyanker, on behalf of himself and any entities he controls, now or in the future,  
14 wishes to dismiss with prejudice and forever release all remaining counterclaims against  
15 Nextdoor.com and Janakiraman.

16 4. Each party preserves the right to move for or oppose an award of attorneys’ fees  
17 and costs with respect to the matters dismissed and adjudicated by this Order at an appropriate  
18 time in this action and to present any and all admissible evidence with respect to such a motion.

19 5. Nothing in this Stipulation shall be construed as an admission of liability or  
20 wrongdoing of any kind by any of the parties hereto.

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3 Stipulated and agreed to this 13th day of June 2014.  
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6 /s/ Bruno W. Tarabichi  
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Bruno W. Tarabichi  
Heather R. Norton  
Scott J. Allen  
Attorneys for Defendant  
Raj Abhyanker

13 /s/ Ilana Rubel  
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FENWICK & WEST LLP  
Ilana Rubel  
Attorneys for Plaintiffs and  
Counterdefendants Nextdoor.com, Inc.  
and Prakash Janakiraman

18 **ATTESTATION**

19 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories to this filing have  
20 provided their consent to this filing.

21 /s/ Bruno W. Tarabichi  
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Bruno W. Tarabichi

## **[PROPOSED] ORDER**

In accordance with the stipulation of the parties, and for good cause shown, the Court hereby orders, adjudges and decrees that:

1. Counterclaimant Raj Abhyanker's claim of trade secret misappropriation is hereby dismissed with prejudice.
2. Counterclaimant Raj Abhyanker's claims of trademark infringement, to the extent not already dismissed pursuant to the Court's Entry of Partial Dismissal, Dkt. 192, are hereby dismissed with prejudice.
3. Counterclaimant Raj Abhyanker's claim of California Unfair Competition is hereby dismissed with prejudice.

IT IS SO ORDERED.

ENTERED this 17<sup>th</sup> day of June, 2014



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